

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

\_\_\_\_\_  
ALICIA HERNANDEZ, et al., )  
individually and on )  
behalf of others )  
similarly situated, )  
Plaintiff, )  
vs. )Case No.  
3:18-cv-07354-WHA  
WELLS FARGO & COMPANY and )  
WELLS FARGO BANK, N.A., )  
Defendants. )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF SUSAN CRAWFORD  
Los Angeles, California  
Thursday, November 14, 2019  
Volume I

Reported by:  
Lori M. Barkley  
CSR No. 6426  
Job No. 3666131-B

1 A. They're reported by the line of business. 15:03:20	1 described where the line of business would fill out 15:06:45
2 Q. Okay. And what's the procedure for that 15:03:22	2 the form, it would go to a committee can, the 15:06:46
3 reporting by the line of business? 15:03:27	3 committee would determine if remediation was 15:06:48
4 A. Now or then? 15:03:29	4 necessary and then if it was, it would go to the 15:06:51
5 Q. Now. 15:03:31	5 customer impact team. 15:06:56
6 A. Now? 15:03:33	6 Do I have that right? 15:06:56
7 Q. Yeah. 15:03:34	7 A. The committee is part of the customer impact 15:07:03
8 A. The procedure now is for the -- for them to 15:03:35	8 team process, yeah. 15:07:06
9 report it and then it goes to a committee. 15:03:38	9 Q. Okay. Thanks for that clarification. 15:07:07
10 Q. And what is the mechanics of the report? Is 15:03:44	10 And so that committee that's part of the 15:07:09
11 it a written report? Is it a verbal report? 15:03:48	11 customer impact team, at some point, do they issue a 15:07:14
12 A. Yeah. It's a form on the system. 15:03:54	12 customer impact ticket if -- if they determine that 15:07:21
13 Q. Okay. So can you describe for me if the 15:03:59	13 that's what's appropriate? 15:07:23
14 line of business because aware of an issue that 15:04:01	14 A. It sends a file number as soon as it's 15:07:27
15 requires auditing, what do they do to get that 15:04:09	15 reported. 15:07:33
16 information to your group? 15:04:11	16 Q. And is that file number synonymous with a 15:07:33
17 A. They would draw up the form, report it, we 15:04:21	17 CIT number -- 15:07:36
18 call it reporting it, and then it goes to a committee 15:04:23	18 A. Yes, yes. 15:07:37
19 and they ask the line of business a bunch of 15:04:28	19 Q. Okay. So at what point from the form you 15:07:40
20 questions and then it goes into our system. 15:04:35	20 filled out and sent to the customer impact team 15:07:47
21 And if it's determined that remediation's 15:04:42	21 committee, at what point does that CIT number get 15:07:55
22 needed, then it goes into our system and then as they 15:04:47	22 issued? Immediately once it gets there? 15:07:59
23 work it, they'll send us the requests for different 15:04:53	23 A. It's immediately when the form -- when they 15:08:01
24 check points. 15:05:02	24 enter the form on the -- 15:08:03
25 Q. Okay. And about how long has that been the 15:05:04	25 Q. Okay. So the form being filled out 15:08:04
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1 procedure for transferring that information from the 15:05:08	1 generates a -- 15:08:08
2 line of business to the audit group? 15:05:12	2 (Speaking simultaneously.)
3 A. Who are you calling the audit group? 15:05:14	3 THE WITNESS: Yeah, yeah. 15:08:09
4 Q. The quality consultants, your group. 15:05:22	4 BY MR. BLOOMFIELD: 15:08:10
5 A. I don't know, it's been awhile. A long 15:05:38	5 Q. Great, okay. Ms. Crawford, I've just handed 15:08:10
6 time. 15:05:40	6 you a document that was previously marked 15:08:35
7 Q. Would you say more than five years? 15:05:40	7 Exhibit 444. During this morning's deposition. I'd 15:08:42
8 A. Oh, yeah. 15:05:42	8 ask you to please take a look at that and let me know 15:08:49
9 Q. More than 10 years? 15:05:43	9 when you're ready to discuss it. 15:08:53
10 A. Probably not. 15:05:45	10 A. Okay. 15:10:18
11 Q. Okay. 15:05:47	11 Q. On the bottom right-hand corner of all the 15:10:18
12 A. I wasn't -- I mean, I don't know what the 15:05:50	12 documents we've been looking at today, there's a 15:10:20
13 process was before I got there. 15:05:52	13 number that's called a Bates number and that's unique 15:10:23
14 Q. Okay. I don't want to be imprecise in 15:05:54	14 to each page. 15:10:25
15 referring to any of these entities within your 15:05:58	15 So sometimes I'll refer to that number to 15:10:25
16 organization. So when I said "the audit group," and 15:06:02	16 help you get to the page that -- that I want to look 15:10:27
17 you said, you know, there's no such thing, what -- 15:06:04	17 at with you. So if you could turn to the second page 15:10:30
18 what is the group -- the proper name of the group 15:06:07	18 of the e-mail which has Bates number 748 on it. 15:10:38
19 that you're a part of? 15:06:09	19 Are you with me? 15:10:42
20 A. Customer impact team. 15:06:11	20 A. Yes. 15:10:48
21 Q. Okay. And what is the relationship between 15:06:12	21 Q. Okay. Now, this is the second -- second 15:10:49
22 a customer impact ticket and a customer impact team? 15:06:19	22 half of the document -- or of this page, looks like 15:10:50
23 A. A customer impact ticket would be the issue 15:06:29	23 it's an appointment notification from Tiffany Brown. 15:10:57
24 that would be reported to the customer impact team. 15:06:37	24 Do you see that? 15:10:59
25 Q. Okay. So to return to that process that you 15:06:42	25 A. Yes. 15:11:00
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